

EXHIBIT B

THE CITY OF REVERE, MASSACHUSETTS



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OFFICE OF THE CITY SOLICITOR

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Thomas G. Ambrosino
Mayor

March 16, 2006

James S. Dilday, Esq.
Grayer & Dilday, LLP
27 School Street, Suite 400
Boston, MA 02108

Re: Pechner-James, et al., v. City of Revere, et al.

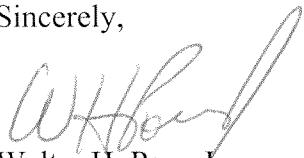
Dear Attorney Dilday:

On February 22 and 24, 2006, I attempted to engage you in the meet and confer process you invited in your letter of February 15, 2006, which accompanied your clients' summary judgment pleadings. In my mind, this process went awry when someone other than yourself responded on February 23, 2006, and when that someone then transmitted the motion to the Court on February 28, 2006. Nonetheless, on March 2, 2006, I sent you a letter in a last ditch effort to avoid the needless waste of time and resources which would be expended responding to the motion. Your response of March 7, 2006, affirmed the prophecy in my letter of the 2nd that I wrote in vain. I have now filed the City's opposition pleadings. If my letters of February 22 and 24 and March 2 have not convinced you that your clients' motion is without merit, perhaps my opposition has. If so, its immediate withdrawal is not only requested, but demanded.

In any event, and as required by Fed.R.Civ.P. 11, I enclose herewith the City's motion for Rule 11 sanctions which I will file after the expiration of the 21 day safe harbor period unless you withdraw the summary judgment proceedings and we reach agreement on monetary compensation to my client for wasting my time.

Thank you for your attention to this matter.

Sincerely,


Walter H. Porr, Jr.
Assistant City Solicitor

cc: Attorney Michael Akerson